

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

RowVaughn Wells, Individually and as
Administratrix Ad Litem of the Estate of
Tyre Deandre Nichols, deceased.

Case No. 2:23-CV-02224-MSN-atc

Plaintiff,

**JOINT MOTION TO EXTEND
TIME TO PROVIDE NOTICE OF
PROPOSAL(S) FOR GUARDIAN
AD LITEM TO AUGUST 23, 2024**

vs.

The City of Memphis, a municipality;
Chief Cerelyn Davis, in her official capacity;
Emmitt Martin III, in his individual capacity;
Demetrius Haley, in his individual capacity;
Justin Smith, in his individual capacity;
Desmond Mills, Jr., in his individual capacity;
Tadarrius Bean, in his individual capacity;
Preston Hemphill, in his individual capacity;
Robert Long, in his individual capacity;
JaMichael Sandridge, in his individual capacity;
Michelle Whitaker, in her individual capacity;
DeWayne Smith, in his individual capacity and
as an agent of the City of Memphis.

Defendants.

**PLAINTIFF ROWVAUGHN WELLS AND DEFENDANT CITY OF MEMPHIS'S JOINT
MOTION TO EXTEND TIME TO PROVIDE NOTICE OF PROPOSAL(S) FOR
GUARDIAN AD LITEM**

Plaintiff RowVaughn Wells, together with Defendant City of Memphis (collectively, the “Parties”), by and through undersigned counsel, hereby move this Court to Extend Time to Provide Notice of Proposal(s) for Guardian *ad Litem* to August 23, 2024. In support of this Motion, the Parties state as follows:

1. Defendant City of Memphis filed its Motion to Appoint Guardian *ad Litem* with this Court on April 5, 2024. ECF No. 177.
2. On April 19, 2024, Plaintiff RowVaughn Wells filed her Response in Opposition to Defendant City of Memphis' Motion to Appoint Guardian *ad Litem*. ECF No. 181.
3. Defendant City of Memphis filed its Reply on May 16, 2024. ECF No. 194.
4. On August 2, 2024 this Honorable Court granted Defendant City's Motion and ordered the parties to consult regarding potential guardian *ad litem* candidates and file a notice by August 16, 2024 identifying any agreed-upon candidates or, if no agreement is reached, up to three candidates proposed by Wells and up to three candidates proposed by Defendant City. ECF. No. 202 at p. 8.
5. The parties have exchanged their proposed candidates and held a conference on August 15, 2024.
6. During this conference, the Parties agreed that it would be to their benefit to meet again regarding each party's candidates to attempt to reach an agreement on a candidate.
7. The Parties have scheduled an additional conference for Wednesday, August 21, 2024 to discuss the proposed candidates.
8. This request for a 7-day extension is made in good faith and is not made for the purposes of delay or other dilatory purpose.

Based on the foregoing, Plaintiff RowVaughn Wells and Defendant City of Memphis respectfully request that this court grant this Joint Motion to Extend Time to Provide Notice of Proposal(s) for Guardian *ad Litem* to August, 23, 2024.

Dated: August 16, 2024

Respectfully submitted,

/s/ Sarah Raisch

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